

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA**

IN RE:)	
CAMP LEJEUNE WATER LITIGATION))	Case No. 7:23-cv-897
)	
This Document Relates To: ALL CASES)	UNOPPOSED MOTION FOR LEAVE TO FILE REPLY BRIEF IN SUPPORT OF [D.E. 721] BY DECEMBER 19, 2025
)	

The Plaintiffs’ Leadership Group (“PLG”) respectfully moves the Court for leave to file a reply memorandum in support of their Motion to Reserve Admissibility Determinations and Expedite Track 1 Bellwether Trials [D.E. 721] by December 19, 2025, two days after the 14-day deadline for reply briefs under Local Rule 7.1(g)(1). In support, PLG states:

1. On November 12, 2025, PLG filed a 14-page Motion to Reserve Admissibility Determinations and Expedite Track 1 Bellwether Trials [D.E. 721] (“PLG’s Motion”).
2. On November 21, 2025, Defendant filed an unopposed motion for an extension of time and pages to respond within 21 days of filing (by December 3, 2025) with up to 15 pages in opposition to PLG’s Motion [D.E. 726].
3. On November 24, 2025, this Court granted Defendant’s motion for an extension [D.E. 727].
4. On December 3, 2025, filed a 15-page opposition to PLG’s Motion [D.E. 733].
5. PLG’s Motion sought relief under Federal Rules of Civil Procedure 1 and 16(c)(2), and thus was not a discovery motion under Local Rule 7.1(c). Under Local Rule 7.1(g)(1), a reply memorandum is due within 14 days of Defendant’s opposition, by December 17, 2025.
6. Local Rule 7.2(f) generally sets a 10-page or 2,800-word limit for a reply memorandum.

7. PLG conferred with Defendant and Defendant stated that it does not oppose PLG filing a 5-page reply memorandum by December 19, 2025, two days after the deadline set by Local Rule 7.1(g)(1).

8. Accordingly, PLG respectfully requests that the Court permit PLG to file a 5-page reply memorandum in support of PLG's Motion [D.E. 721] by December 19, 2025.

9. A proposed order is attached as Exhibit 1.

[Signatures on following page]

DATED this 15th day of December, 2025.

/s/ J. Edward Bell, III

J. Edward Bell, III (admitted *pro hac vice*)
Bell Legal Group, LLC
219 Ridge St.
Georgetown, SC 29440
Telephone: (843) 546-2408
jeb@belllegalgroup.com

Lead Counsel for Plaintiffs

/s/ Elizabeth J. Cabraser

Elizabeth J. Cabraser (admitted *pro hac vice*)
Lieff Cabraser Heimann & Bernstein,
LLP 275 Battery Street, 29th Floor
San Francisco, CA 94111
Telephone: (415) 956-1000
ecabraser@lchb.com

Co-Lead Counsel for Plaintiffs

/s/ W. Michael Dowling

W. Michael Dowling (NC Bar No. 42790) The
Dowling Firm PLLC
Post Office Box 27843 Raleigh,
North Carolina 27611 Telephone:
(919) 529-3351
mike@dowlingfirm.com

Co-Lead Counsel for Plaintiffs

/s/ Robin L. Greenwald

Robin L. Greenwald (admitted *pro hac vice*)
Weitz & Luxenberg, P.C.
700 Broadway
New York, NY 10003
Telephone: 212-558-5802
rgreenwald@weitzlux.com

Co-Lead Counsel for Plaintiffs

/s/ James A. Roberts, III

James A. Roberts, III
Lewis & Roberts, PLLC
3700 Glenwood Ave., Ste. 410
Raleigh, NC 27612
Telephone: (919) 981-0191
jar@lewis-roberts.com

Co-Lead Counsel for Plaintiffs

/s/ Mona Lisa Wallace

Mona Lisa Wallace (N.C. Bar No.: 009021)
Wallace & Graham, P.A.
525 North Main Street
Salisbury, North Carolina 28144
Tel: 704-633-5244
mwallace@wallacegraham.com

Co-Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on December 15, 2025, I electronically filed the foregoing using the Court's Case Management/Electronic Case Files system, which will send notice to all counsel of record.

/s/ J. Edward Bell, III_____

J. Edward Bell, III